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964824

REPORT ON INSPECTION TO DETERMINE  
COMPLIANCE WITH THE PCB DISPOSAL  
AND MARKING REGULATIONS

GHR FOUNDRY  
400 DETRICK STREET  
DAYTON, OHIO 45404

EPA Region 5 Records Ctr.



PERFORMED BY:

OHIO ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF EMERGENCY RESPONSE  
P.O. BOX 1049, 1800 WATERMARK DRIVE  
COLUMBUS, OHIO 43266-0149

AS AUTHORIZED UNDER THE  
U.S. EPA PILOT TSCA COOPERATIVE  
ENFORCEMENT AGREEMENT PROGRAM

## PCB COMPLIANCE INSPECTION REPORT

### I. OBJECTIVES

The inspection was conducted to document the facility's handling, storage and disposal practices and to determine its compliance with the PCB Regulations, 40 CFR Part 761, as published in the Federal Register of May 31, 1979 and as amended.

### II. COMPANY IDENTIFICATION

GHR Foundry  
400 Detrick Street  
Dayton, Ohio 45404  
(513) 224-0851

#### Responsible Official

Mr. John Peloquin, President  
John Paul Enterprises  
400 Detrick Street  
Dayton, Ohio 45404

### III. DATE OF INSPECTION

June 17, 1991

### IV. PARTICIPANTS

#### COMPANY

Mr. John Peloquin, President

#### Ohio EPA

Mr. Tom Buchan, Environmental Specialist II (Author)  
Ms. Susan Netzly, Environmental Specialist I

### V. COMPANY BACKGROUND

(X) PCBs ( ) No PCBs discovered

The facility consisted of three major buildings on 11.8 acres and had conducted grey iron castings until January 1983 when it ceased all operations. The property was purchased from Amcast Industrial Corporation, 3931 South Dixie, Dayton, Ohio on October 7, 1988 by Ohio Industrial Trading Company, 1203 West 65th Street, Cleveland, Ohio

44102, Mr. Ray Carcione, President. The property is also partially owned by John Paul Enterprises, 400 Detrick Street, Dayton, Ohio 45404, Mr. John Peloquin, President. The inspection was conducted based upon Ohio EPA Pollution Incident Reports #10-57-4924 on October 16, 1990 and #5-57-1908 on May 20, 1991 (Attachment C). The reports identified PCB transformers, equipment and drums of oil in storage for greater than one year.

A previous PCB inspection had been conducted while the facility was actively operating on April 28, 1982. A Phase 1 environmental assessment of the property was conducted by Qsource Engineering, Inc., Miamisburg, Ohio for Amcast Industrial Corporation on August 22, 1988 (Attachment D).

## VI. INSPECTION SUMMARY

### Opening Conference

- A. The inspectors met with company officials as indicated in Section II, presented TSCA Inspection Credentials, explained the purpose of the inspection, and presented for signature the TSCA Inspection Forms as indicated below:
- (X) Notice of Inspection
  - (X) TSCA Confidentiality Notice
  - (X) Receipt for Samples/Documents collected
- These documents are enclosed as Attachment A and were signed by Mr. John Peloquin, President of John Paul Enterprises. Mr. Ray Carcione, President of Ohio Industrial Trading Company, signed the TSCA Confidentiality Notice.

### B. Circumstances Applicable to this inspection

- |                       |                        |
|-----------------------|------------------------|
| ( ) Disposal          | ( ) Processing         |
| (X) Marking           | ( ) Distribution       |
| (X) Storage           | (X) Use/Authorizations |
| ( ) Manufacturing     | (X) Recordkeeping      |
| ( ) None of the Above |                        |

### C. CITATION

- ( ) Not Applicable
- (X) Citation issued on June 17, 1991
- (X) Response has not been received

D. Closing Conference

(X) The inspectors explained the three possible outcomes of the inspection and informed the company officials that a final determination and notification would be made by the Regional Office.

VII. SAMPLES/PHOTOGRAPHS/DOCUMENTS

- ( ) None Taken  
(X) See Attachments as listed

VIII. ATTACHMENTS

- A. Notice of Inspection  
TSCA Inspection Confidentiality Notice  
Receipt for Samples/Documents.
- B. Field Citation
- C. OEPA Pollution Incident Report #10-57-4924  
and #5-57-1908
- D. Qsource Phase 1 Environmental Assessment -  
8/22/88.
- E. AMCAST Industiral Corporation - Transformer  
Documentation
- F. Cover Letters - 6/21/91 and 7/8/91
- G. Photographs

IX. INSPECTOR'S COMMENTS

\_\_\_\_\_ Disposal X \_\_\_\_\_ Marking X \_\_\_\_\_ Use/Authorization  
\_\_\_\_\_ X \_\_\_\_\_ Storage X \_\_\_\_\_ Recordkeeping \_\_\_\_\_ Manufacturing/  
Processing \_\_\_\_\_ Distribution \_\_\_\_\_ Other

Mr. Peloquin stated that GHR Foundry had closed their manufacturing operations in 1982 and the property had been vacant until it was purchased in October 1988 by Ohio Industrial Trading Company and John Paul Enterprises. Mr. Peloquin stated that all the equipment on the property was to be sold and all the buildings, except for the office building, were to be demolished and the remaining property would be sold. Company officials also stated that when the facility was purchased all transformers and capacitors were in service and each of

the six substations were to be disconnected (taken out of service) as each of the separate buildings was to be demolished.

According to the Qsource Engineering site assessment (1988) the company had 18 transformers and banks of capacitors in vaults F1 and F2, and in the basement vault of the office building, (number not specified). The previous OEPA PCB compliance inspection (1982) indicated there were 48 large low voltage and nine large high voltage capacitors in use. Documentation submitted by AMCAST Industrial Corporation (Attachment E) regarding the transformers indicates there are four PCB, seven PCB-contaminated and seven non-PCB transformers.

Company officials stated that two of the PCB transformers located at one of the melting furnaces were drained and the bank of capacitors were removed and placed into storage for disposal in September/October 1990. The other two PCB transformers (located at the other melting furnace) were taken out of service in 4/91 and the remaining transformers and capacitors were taken out of service in either 9/90 or 4/91.

At the time of inspection the following transformers and capacitors were observed:

Outside - between Office Building and "H" Building, undiked, no roof or walls, no M<sub>L</sub> for storage area

- 1) Westinghouse Inerteen, S/N PBV 7042-01, 289 gallons  
-drained, out of service since 9/90  
-has M<sub>L</sub>, but no date of storage,
- 2) Westinghouse Inerteen S/N YBR 91831, 421 gallons  
-drained, out of service since 9/90  
-has M<sub>L</sub>, but no date of storage;

"H" Building-(center substation) - diked, indoors, no M<sub>L</sub> for access

- 1) Westinghouse Inerteen, S/N YBR91832, 421 gallons  
-no M<sub>L</sub>, no leaks  
-out of service 4/91, but no date of storage  
-no M<sub>L</sub> for storage area,
- 2) Allis Chalmers, S/N 3080552, 210 gallons oil,  
test by HVM (6/30/82) to be 123 ppm  
- no leaks  
- out of service 4/91, but no storage date,

- 3) Line Material (Ohio Transformer), S/N 1224326 (G28555), 220 gallons oil, test by HVM (6/30/82) to be 285 ppm
  - no leaks
  - out of service 4/91, but no storage date;

Behind "H" Building Riverside - has roof and walls, but no dike; no  $M_L$  for access or storage area

- 1) ITE Non-Flammable Liquid, S/N 11168-64, 465 gallons
  - has  $M_L$ , no leaks
  - out of service since 4/91, but no storage date,
- 2) Six large (no visible nameplate) assume to be PCB capacitors
  - no  $M_L$ 's, no leaks
  - out of service since 4/91, but no storage date;

"G" Building - indoors, undiked, no  $M_L$  for storage area

- 1) G.E. (Ohio Transformer), S/N 4811763, 298 gallons oil, test by HVM (6/30/82) to be 113 ppm
  - no leaks
  - out of service 9/90, but no storage date,
- 2) Line Material (Ohio Transformer), S/N 1420383, 181 gallons oil, test by HVM (6/30/82) to be 60 ppm
  - no leaks
  - out of service 9/90, but no date of storage,
- 3) Allis Chalmers, S/N 3080552, 210 gallons oil, test by SUNOHIO to be 50-500ppm (documents 122 ppm)
  - no leaks
  - out of service 9/90, but no date of storage,
- 4) Forty-five (45) 55 gallon drums of lube oil left over from AMCAST (appear to be original product), but company will have tested;

Office Building Basement - indoors, no dike, no  $M_L$  for storage area

- 1) Nine (9) large, high voltage (12470 volts) G.E. Pyranol capacitors
  - no leaks, all have  $M_L$ 's
  - out of service 4/91, but no storage dates;

"G" Building "PCB Storage Area" - indoors, no dike, has M<sub>L</sub> on access. Note: company used visqueen and sand for a "make shift" dike


- 1) Thirty-seven (37) large, low volt (100 KVA) PCB capacitors from Furnace Rooms F1 and F2 melt
  - only five have M<sub>L</sub>s
  - out of service 9/90, but no dates of storage
  - no leaks, stored on wooden pallets or on top of wooden dolly,
- 2) Twelve (12) 55 gallons drums with PCB oil drained from two PCB transformers
  - all have M<sub>L</sub> labels
  - out of service 9/90, but no dates of storage
  - no leaks, stored on cardboard and two layers visqueen,
- 3) On 55 gallon drum containing light ballasts
  - has M<sub>L</sub> label.

Eight other transformers were observed to be non-PCB by test labels and/or documentation submitted by the company. According to transformer documentation Westinghouse S/N YBR-91841, 390 gallons oil, tested 229 ppm was not observed or was not on the property at the time of inspection. Five of the 57 PCB capacitors were not observed as officials stated they were out of service, but remained on furnaces throughout the plant.

At the time of inspection the company could not provide PCB Annual Documents for 1988 and 1989 for four nameplated PCB transformers and approximately 57 large PCB capacitors. In addition, facility officials could not provide written documentation of quarterly inspections, but did state that visual inspections were conducted two times a month. Company officials also stated that the fire department had conducted visual inspections of the facility three times since 1988, but the company had not provided the fire department a written notification of the PCB transformers.

Copies of the federal TSCA PCB regulations, Notification and Manifesting for PCB Waste Actives and list of PCB disposal and cleanup contractors were sent to Mr. Ray Carcione, President of Ohio Industrial Trading Company and Mr. John Peloquin, President of John Paul Enterprises on June 21 and July 8, 1991, respectively (Attachment F).

Photographs are included in Attachment G.

  
Inspector's Signature

ATTACHMENT A





## TOXIC SUBSTANCES CONTROL ACT

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

## NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 6/17/91	INSPECTOR NO. OH-021	DAILY SEQ. NO. 02	1:20	G H & R Foundry
4. INSPECTOR ADDRESS Ohio EPA/DERR/Compliance Unit P.O. Box 1049 Columbus, Ohio 43266-0149				5. FIRM ADDRESS 400 Detrick Street Dayton, OH 45404

## REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

- ☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data☐ D. Personnel data☐ B. Sales data☐ E. Research data☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME Thomas P. Buchanan		NAME John P. ...	
TITLE Environmental Specialist	DATE SIGNED 6/17/91	TITLE ...	DATE SIGNED ...



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME	
DATE 6/17/91	INSPECTOR NO. OH-021	DAILY SEQ. NO. 02	GH+R Foundry	
3. INSPECTOR NAME Thomas P. Buchan			4. FIRM ADDRESS 400 Detrick Street Dayton, Ohio 45404	
5. INSPECTOR ADDRESS Ohio EPA-DERR Compliance Unit P.O. Box 1049 Columbus, Ohio 43266-0149			6. CHIEF EXECUTIVE OFFICER NAME Mr. John Teloguin	
			7. TITLE President	

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

Emma Avant  
U.S. EPA Region V 5SPT-7  
230 South Dearborn Street  
Chicago, Illinois 60604

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

Copy sent 6/19/91

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.	
I have received and read the notice			
SIGNATURE		NAME	Mr. Ray Carciene
NAME		TITLE	President, Ohio Industrial Training Co.
TITLE		ADDRESS	1203 West 65th Street
	DATE SIGNED		



## TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME		
DATE 6/17/91	INSPECTOR NO. 04-021	DAILY SEQ. NO. 02	GH&R Foundry		
3. INSPECTOR NAME Thomas P. Buchan			4. FIRM ADDRESS 400 Detrick Street Dayton, Ohio 45404		
5. INSPECTOR ADDRESS Ohio EPA-DERR Compliance Unit P.O. Box 1049 Columbus, Ohio 43266-0149			6. CHIEF EXECUTIVE OFFICER NAME Mr. John Beloguin		
			7. TITLE President		

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While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

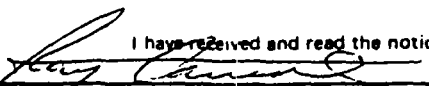
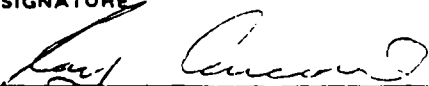
If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

Emma Avant  
U.S. EPA Region V 5SPT-7  
230 South Dearborn Street  
Chicago, Illinois 60604

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

## TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice 	
SIGNATURE	
	
NAME	
RAY CARCIONE	
TITLE	DATE SIGNED

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

NAME
Mr. Ray Carcione
TITLE
President
ADDRESS
Ohio Industrial Trading Company 1203 West 65th Street Cleveland, Ohio 44102



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

June 19, 1991

CERTIFIED MAIL

Mr. Ray Carcione, President  
Ohio Industrial Trading Company  
1203 West 65th Street  
Cleveland, Ohio 44102

Mr. Carcione:

On June 17, 1991, a federal TSCA PCB inspection was conducted at the GH&R Foundry, 400 Detrick Street, Dayton, Ohio. Inspectors met with Mr. John Peloguin, President of John Paul Enterprises.

Enclosed you will find copies of inspection documents issued at the time of inspection. Mr. Peloguin indicated that he did not have the authority to sign the TSCA Inspection Confidentiality Notice. Therefore, it is requested that you sign your signature, print your name, title and date the Confidentiality Notice and return the original in the enclosed self-addressed stamped envelope.

Thank you for your cooperation. If you have any questions, you may contact me at 614/644-3063.

Regards,

Tom Buchan  
Environmental Specialist II  
Division of Emergency and  
Remedial Response

TB/cs



TOXIC SUBSTANCES CONTROL ACT

UMD NO. 2070-0001  
Expires 3-31-88

## RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME	
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
6/17/91	OH-021	02	G H + R Foundry	
3. INSPECTOR ADDRESS			4. FIRM ADDRESS	
Ohio EPA/DERR/Compliance Unit P.O. Box 1049 Columbus, Ohio 43266-0149			400 Detrick Street Dayton, Ohio 45404	
The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.				
RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:				
NO.		DESCRIPTION		
Documents		Environmental Site Assessment Report by Q Source Engineering Aug. 22, 1988 - 8 pages		
2		Photographs		
OPTIONAL:				
DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED <input type="checkbox"/> NOT REQUESTED <input type="checkbox"/>				
INSPECTOR SIGNATURE		RECIPIENT SIGNATURE		
Thomas P. Buchan		[Signature]		
NAME		NAME		
Thomas P. Buchan		John P. [unclear]		
TITLE		DATE SIGNED		DATE SIGNED
Environmental Specialist		6/17/91		

INSPECTOR'S FILE

**ATTACHMENT B**



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

FIELD CITATION

REPLY TO THE ATTENTION OF:

G H + R Foundry

Facility Name

400 Detrick Street

Dayton, Ohio 45404

Facility Address

City, State

\* \* \*

Compliance Inspection  
Date:

June 11, 1991

This is a formal notification concerning the compliance inspection conducted at the facility named above, pursuant to Section II of the Toxic Substances Control Act (TSCA), 15 U.S.C. Section 2601 et seq. The purpose of the inspection was to assess the facility's compliance with the requirements of the Polychlorinated Biphenyls (PCB) Final Rule, 40 C.F.R. Part 761, and amendments.

Issuance of this citation and receipt of any documentation does not preclude the U.S. EPA from proceeding under TSCA or any other applicable statute and assessing appropriate penalties. Any enforcement action taken by the U.S. EPA after a final evaluation of the inspection report would not be limited to the violations listed in this citation.

It appears that the above-named facility was not in compliance with the requirements of 40 C.F.R. Part 761. The inspection revealed the following violations:

1. ☒ AUTHORIZATIONS  
(Use 761.30)

2. ☒ MARKING  
(761.40)

3. ☒ STORAGE  
(761.55)

4. ☒ RECORDKEEPING  
(761.180)

5. OTHER \_\_\_\_\_

Comments On Violations Cited Above

Authorizations 761.30(a)(1)(vi) - facility failed to provide PCB Transformer Registration Letter with appropriate fire response personnel for four nameplated PCB transformers. F.D. did conduct visual inspections ~~(XII)~~ - facility failed to construct PCB quarterly transformer inspections from fourth quarter 1988 to time of inspection for third quarter 1990 for Westinghouse Interteen S/N PBV 7042-01 and S/N YBR-91831; to second quarter 1991 for ITE Non-Flammable Liquid S/N 11168-64; and annual (diked) for 1988 and 1989 for Westinghouse Interteen S/N YBR 91832

Marking 761.40 - facility failed to place M<sub>1</sub> label on access ways to Westinghouse Interteen S/N YBR 91832 and ITE Non Flammable Liquid S/N 11168-64; no M<sub>2</sub> labels on 38 large large low/high voltage PCB caps in storage; no M<sub>2</sub> labels for storage area for Westinghouse Interteen S/N PBV 7042-01 and S/N YBR 91831; and no M<sub>2</sub> on Westinghouse Interteen S/N YBR 91832

Storage 761.65 - Improper storage area i.e.) undiked; no dates of storage on four nameplated PCB transformers, 52 large low/high voltage PCB capacitors, twelve 55 gallon drums of PCB transformer oil and five PCB-contaminated transformer (two of which were di

Record Keeping 761.180(a) - facility failed to maintain PCB Annual records from 1988 and 1989 for four nameplated PCB transformers and 52 PCB capacitors



CITATION

DOCUMENTATION REQUIRED TO CORRECT THE ABOVE VIOLATION(S)

Authorizations 761.30 (a)(1)(vi) - provide documentation that Fire Dept.  
conducted inspections/aware of AB transformers on-site  
Marking 761.40/Storage 761.65 - submit photographs that all PCB  
items in storage for disposal are located in proper storage area  
have M<sub>1</sub> labels and dates of storage on each item  
Record Keeping 761.180(a) - reconstruct PCB Annual Records for  
1988 and 1989

Within thirty (30) days of receipt of this Field Citation this facility must submit the requested documentation to show that the violation(s) has/have been corrected. The documentation must be submitted to:

Inspector's Name Thomas P. Buchan

Address Ohio EPA/DERR/Compliance Unit  
P.O. Box 1049

City, State Columbus, Ohio 43266-0149

If you have questions concerning this inspection or this Field Citation, please call the inspector at (614) 644-3063.

Issued To/Received By \_\_\_\_\_ Date \_\_\_\_\_  
Inspector's Signature Thomas P. Buchan Date 6/17/91

ATTACHMENT C

I.D. Number 10-57-4924 ☐ Confidential Status Requested/Enforcement Sensitive

1. Time & Date Reported 10/16 0932 2. Discovered October 3. Occurred on-site

4. Reported by (Name) non responsive Title \_\_\_\_\_

5. Telephone non responsive Entity Reporting SWAPCA Did Spiller Report? Y N Complaint? Y

6. Suspected Spiller GHR Foundary Telephone \_\_\_\_\_

7. Mailing Address 400 Detrick Rd.

12. Location of Spill: (County) Montgomery (Town/TWP) Dayton (Section) \_\_\_\_\_

13. (Street Location) SAE (Lat & Long) \_\_\_\_\_

15. Product Spilled PCB Transformers 16. Amount unk RQ? \_\_\_\_\_ Type: \_\_\_\_\_ Size: \_\_\_\_\_

Product Spilled Asbestos Amount unk RQ? \_\_\_\_\_ Type: \_\_\_\_\_ Size: \_\_\_\_\_

Sources of Spill Dismantling of Bldg. Size: \_\_\_\_\_ Priority: \_\_\_\_\_

17. Areas Affected Waterway/Topography: ALL W G O N Map 10. (Asbestos) Weather \_\_\_\_\_

20. Exposure Potential L M G E Protection Level A B C D

Am Cast owned foundary & paint was operating

- John Polovina, owner (513) 224-0651 (John Paul Enterprises, (Cincinnati, OH))
- property listed as bldg. owned by Ohio Industrial Trading Co, (Cincinnati, OH)
- company has been out of business since 1983; Dismantling began Aug. 17, 1990
- many PCB trans.; some have been drained but many in drums & tanks
- company has been cited for failure to obtain proper permits (Asbestos)
- also "hundreds" of light ballasts being removed
- Pepsi-Cola is leasing area of the bldg. for waste storage; the old foundary (277,000 sq. ft.) is being demolished I spoke to Dave.

Did You Tell Spiller To Call: The N.R.C.? Y N (1-800-424-8802, Washington, D.C.)

The Local EPC? Y N (# In Duty Bool

Send Copy	Time & Date	Talked to
District Office <u>SW</u>		
USEPA/USCG		
SFM (752-7938)		
ODNR (night 265-7006)		
District Engineer		
Water Supply (4-2752)		
DSHWM		
Dept. of Health		
ODA (866-6361)		
PIC (2160) Al Franks (848-9691)		
Local Agency or LEPC		
Local FD or PD		
WQMA/Ground Water		

I.D. Number 5-57-1908☐ Confidential Status Requested/Enforcement Sensitive1. Time & Date Reported 5/202. Discovered 4/303. Occurred 1 year4. Reported by (Name) non responsiveTitle Environmental5. Telephone non responsiveEntity Reporting: Dayton F.D. Did Spiller Report? Y (N) Complaint? (Y)6. Suspected Spiller G H & R Foundry

Telephone \_\_\_\_\_

7. Mailing Address 400 Detrick St.12. Location of Spill: (County) Montgomery (Town/TWP) Dayton (Section) \_\_\_\_\_13. (Street Location) Same (Lat & Long) \_\_\_\_\_15. Product Spilled PCB trans16. Amount ≈ 3 to 5 RQ? \_\_\_\_\_ Type: \_\_\_\_\_ Size: \_\_\_\_\_Product Spilled 55 gal. Drums of PCB oilAmount 12 RQ? \_\_\_\_\_ Type: \_\_\_\_\_ Size: \_\_\_\_\_Sources of Spill no spill / storage

Size: \_\_\_\_\_ Priority: \_\_\_\_\_

17. Areas Affected Waterway/Topography: A L W G O N none

Weather \_\_\_\_\_

20. Exposure Potential L M G EProtection Level A B C D

- Ohio Industrial Trading Co. / John Paul Enterprises (513) 224-0851  
 the facility; out of business approx 10-12 years; in process of demolition

- PCB trans. (labeled) and drums of PCB oil in storage for  
 possibly 1 year - located inside Bldg. G. - Maintenance Bldg.

- John Peloguin, Owner/Pres. of John Paul Enterprises, Chartered  
 on July 13, 1988 #728696; (513) 224-0851

- Security Guard: Dolman Sybert

- John Peloguin m. in from Toledo or Cleveland

- F.D. concerned about improper handling/disposal of PCBs

Did You Tell Spiller To Call The NRC? Y N (1-800-424-8802, Washington, D.C.)The Local EPC? Y N (# In Duty Book)

	Send Copy	Time & Date	Talked to
District Office <u>SWDC</u>	<input type="checkbox"/>	<u>6/5/91</u>	<u>answering machine</u>
USEPA/USCG	<input type="checkbox"/>	<u>11:30am 6/6/91</u>	<u>Lt Sauber</u>
SFM (752-7938)	<input type="checkbox"/>		<u>7A-4pm guard on duty.</u>
ODNR (night 265-7006)	<input type="checkbox"/>		
District Engineer	<input type="checkbox"/>		
Water Supply (4-2752)	<input type="checkbox"/>		
DSHWM	<input type="checkbox"/>		
Dept. of Health	<input type="checkbox"/>		
ODA (866-6361)	<input type="checkbox"/>		
PIC (2160) Al Franks (848-9691)	<input type="checkbox"/>		
Local Agency or LEPC <u>D.F.D.</u>	<input checked="" type="checkbox"/>		
Local FD or PD <u>D.F.D.</u>	<input checked="" type="checkbox"/>		
WQMA/Ground Water	<input type="checkbox"/>		
<u>PCB</u>	<input checked="" type="checkbox"/>		

ATTACHMENT D

1A02

ENVIRONMENTAL SITE ASSESSMENT  
OF GHR FOUNDRY  
400 DETRICK STREET  
DAYTON, OHIO

Prepared for:

JAMES S. HOLLANDER  
AMCAST INDUSTRIAL CORPORATION  
3931 SOUTH DIXIE  
DAYTON, OHIO

Prepared by:

QSOURCE ENGINEERING, INC.  
228 BYERS ROAD, SUITE 300  
MIAMISBURG, OHIO 45342

August 22, 1988

## TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
I. EXECUTIVE SUMMARY . . . . .	1
II. INTRODUCTION . . . . .	2
III. DESCRIPTION AND HISTORY . . . . .	2
IV. ON-SITE INVESTIGATION . . . . .	2
- CUPOLAS AND BAGHOUSE CONTROL SYSTEM. . . . .	2
- ELECTRICAL TRANSFORMERS. . . . .	2
- UNDERGROUND STORAGE TANKS. . . . .	5
- INSULATING MATERIAL. . . . .	7
- HYDRAULIC SYSTEMS. . . . .	7
- PAINTED SURFACES . . . . .	7
- WATER WELLS. . . . .	8
V. RELATED INVESTIGATION . . . . .	8
- OHIO EPA RECORDS . . . . .	8
- REGIONAL AIR POLLUTION CONTROL AGENCY. . . . .	8
- DAYTON WELL FIELD PROTECTION ORDINANCE . . . . .	8
- REGULATORY AGENCY SITE LISTS . . . . .	9
VI. CONCLUSIONS AND RECOMMENDATIONS . . . . .	9

## APPENDICES

A. PHOTOGRAPHS
B. OEPA CLOSURE LETTER
C. TANK REGISTRATION FORM
D. LAB REPORTS
E. PYDRAUL DATA
F. WELL LOG - ODNR/LAYNE
G. NPDES DOCUMENTS
H. AIR PERMIT DOCUMENTATION
I. QSOURCE CHECKLIST

## EXECUTIVE SUMMARY

Qsource Engineering, Inc. has completed a Phase I environmental assessment of the GHR Foundry property located at 400 Detrick Street, Dayton, Ohio. There are seven aspects of the property, buildings or related equipment for which specific actions are recommended.

1. A hazardous waste closure plan is required by Ohio EPA (and U.S. EPA) for the cupola baghouse and associated equipment. The plan which was originally submitted to Ohio EPA is not acceptable. Efforts should continue to reach agreement with regulatory agencies on closure.
2. Eleven electrical transformers on site contain cooling oils with concentrations of PCB's greater than 50 parts per million. These transformers should be removed, or otherwise cleaned of PCB's immediately.
3. Six underground storage tanks are present on site. In light of pending federal regulations and existing Ohio regulations, these tanks should either be removed or deactivated.
4. Limited sampling revealed asbestos containing insulation at four (4) locations. These areas should be locked or barricaded to prevent possible human exposure. Demolition or renovation should be preceded by removal of all asbestos-containing material. A detailed survey is recommended.
5. Systems containing hydraulic oil should undergo periodic leak inspections. Prior to repair or removal of these systems, the hydraulic oil should be drained and removed for disposal/recycling.
6. Significant deterioration of internal painted surfaces exists. Workers involved in scraping or cleaning should be provided respiratory protection against lead (Pb) and other metallic pigment dusts.
7. All on-site water wells should receive either routine maintenance, or be closed off in accordance with Ohio EPA regulations.

Since most of the environmental permits associated with GHR's operations have expired or been withdrawn, future operators of equipment at this site should check with City of Dayton, State of Ohio, and Federal regulators concerning permissible activities.



## INTRODUCTION

At the request of James S. Hollander of Amcast Industries Corporation, QSource Engineering, Inc. has performed an environmental assessment of the GHR Foundry at 400 Detrick Street in Dayton, Ohio. The assessment consisted of an on-site inspection of the property, limited sampling of insulation material, an examination of historical aerial photographs, review of the files of Ohio EPA and the Regional Air Pollution Control Agency, personal interviews with GHR management, and review of other related data as noted in this report.

## DESCRIPTION AND HISTORY

Grey iron foundry operations have been carried out on this site since at least 1946. GHR ceased operations in January of 1983, and the facility remains inoperative at the present time. Figure 1 is a map showing the general location. Figure 2 is an aerial photograph from 1987 showing the site and buildings. The present property consists of approximately 11.5 acres. Three major buildings are present: the main building (Bldg. H) covers about 190,000 square feet; the core manufacturing building (Bldg G) covers about 86,000 square feet; and the office building, which covers about 5,700 square feet. GHR is surrounded by other industries to the east, west, and (across the Mad River) to the south. Ohio Rt.4 borders the property on the north.

## ON-SITE INVESTIGATION

On August 10, 1988 David Redic and Edward Everding inspected the facility. They were accompanied by Samuel Howell of GHR.

Cupolas and Baghouse Control System - Two melting cupolas, ductwork and the associated fabric filter system remain on site. Dust collected by the filter system is considered to be hazardous by EPA due to its cadmium and lead content. (Photo 1) Because the facility is closed, Ohio EPA has requested a written plan for clean up and disposal of remaining on-site materials. A closure plan was submitted to Ohio EPA on March 25, 1988. On July 27, 1988, Ohio EPA disapproved the plan (Appendix B). GHR may submit an amended plan within 30 days, and according to Mr. Reece Prather of Amcast, this will be done.

Electrical Transformers - Eighteen electrical transformers are located throughout the site. The table below summarizes general information on these transformers.

<u>Serial No.</u>	<u>Coolant Capacity</u>	<u>PCB's*</u>	<u>Location</u>
11168-64	465 gal.	Y	Vault "D" melt dept
YER-91832	421 gal.	Y	" "E" finish dept
YER-91831	421 gal.	Y	" F1 melt dept
PEV-77402-01	289 gal.	Y	" F2 melt dept
1420383	181 gal.	Y	" A found dept
1420384	181 gal.	N	" A " "
4811763	298 gal.	Y	" A " "
3010760	?	Y	" A " "
3030831	?	Y	" A " "
1224326	220 gal.	Y	" B finish dept
3080552	210 gal.	Y	" B " "
GHR#62857	190 gal.	Y	" B " "
3771075	163 gal.	Y	" C core room
3771077	163 gal.	Y	" C " "
371076	163 gal.	Y	" C " "
3030986	?	Y	" C " "
3010739	?	Y	" C " "
YER-91841	390 gal.	Y	" C " "

\*Concentrations vary. Generally, fluid concentrations below 50 parts per million are exempt from existing regulations.

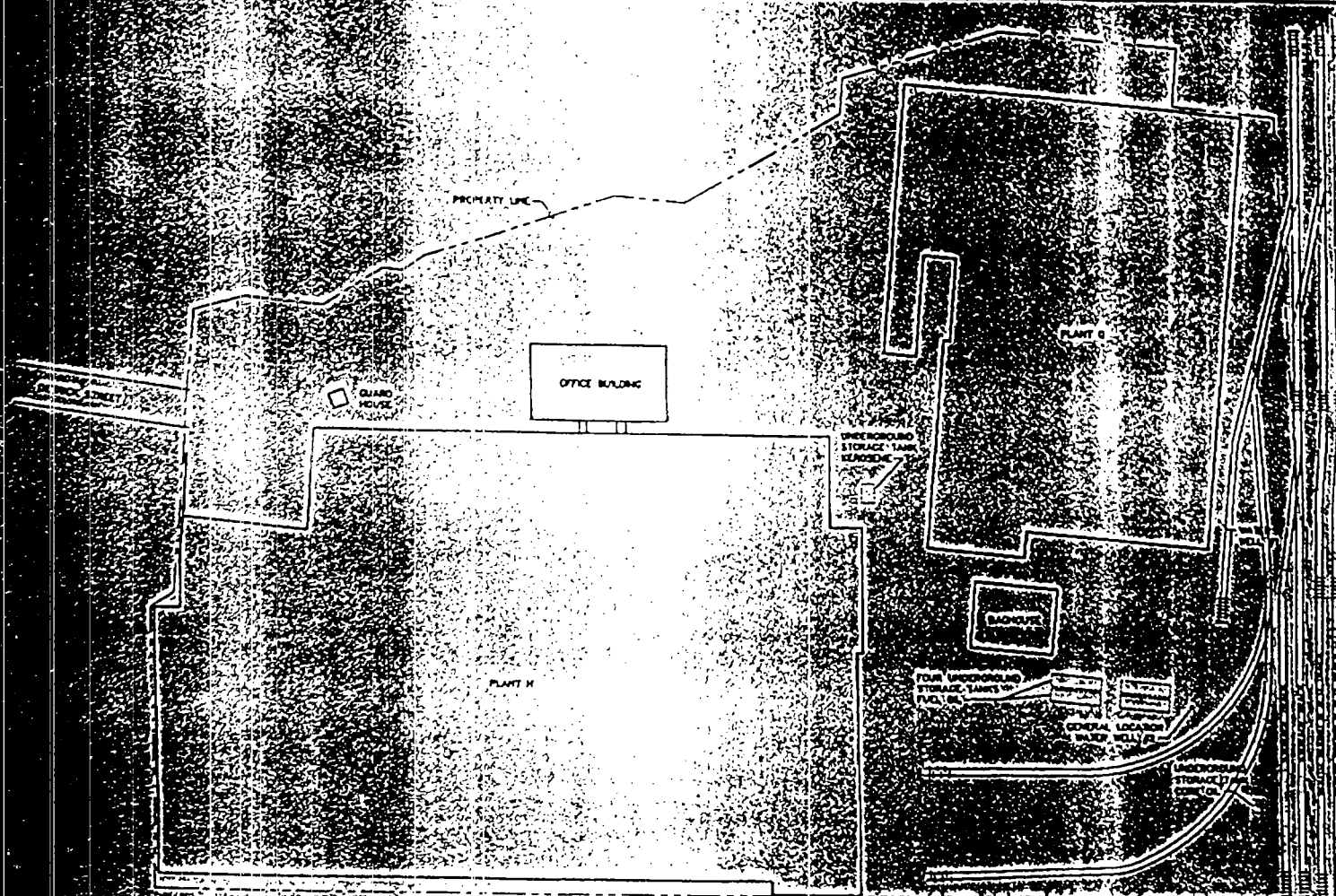
GHR has inspected each unit on a monthly basis, and written records are on file regarding any fluid replacement or leakage. Many of the units, and doors to the vaults, are marked with PCB labels. Each vault room was secured with a padlock (Photos 2 and 3). There was evidence of minor coolant oil leakage in the vault room in the core oven building (Photo 4).

Banks of capacitors exist in vaults F1 and F2, and in the basement vault of the office building (Photo 5). Mr. Howell indicated that some of these capacitors contained PCB's. Documentation was not available at the facility.

Underground Storage Tanks - Six underground storage tanks are present at the facility:

<u>No.</u>	<u>Comp.</u>	<u>Capacity</u>	<u>Current Amt.</u>	<u>Contents</u>	<u>Yr. Installed</u>
1	"	1,000	(?)	Kerosene	?
2	Steel	20,000	Contain 50%	Fuel Oil	1978
3	"	"	"	" "	1978
4	"	"	"	" "	1978
5	"	"	"	" "	1978
6	"	1,500	(?)	Core Oil	1948

Figure 3 and Photos 6, 7, and 8 show the locations of these tanks. Leak testing has not been performed in recent years. The tanks have been registered with the Ohio Fire Marshall's Office. (Appendix C).



STEP PLAN



FIGURE 3

STEP PLAN

AGRIUM FURNORY

1000 DESMOND STREET

Q SOURCE INCORPORATED, INC.

Insulating Materials - Relatively little insulating material was present in the two main buildings. Fiberglass was noted in the core ovens (Photo 9), hot water heater for showers (Photo 10) and piping near the cupolas (Photo 11). Although the scope of this study was not to perform an extensive asbestos survey, samples were taken from four areas for lab analysis: hot blast for cupolas (Photo 12); boiler piping (Photo 13); piping in office basement and spray-on fire proofing (Photo 14). A cooling water return pipe located near the ceiling in the finishing area (near the truck dock) appeared to contain asbestos, but was not readily accessible due to height (Photo 15). Results of the sample analysis are as follows:

<u>Location</u>	<u>% Asbestos</u>
Office basement (piping)	14
Office basement (ceiling)	44
Boiler room (boiler piping)	76
Cupola hot blast	2

Laboratory reports are attached as Appendix D.

Hydraulic Systems - Two large hydraulic systems exist in the main foundry building. These systems serve the automatic lines. Each system contains 400-500 gallons of high temperature hydraulic oil. This oil was formerly manufactured by Monsanto, and is now a product of Stauffer Chemical Co. A Material Safety Data Sheet (MSDS) was obtained for the product - now known as FYRTEK-295 (Appendix E). The fire retardant ingredient (triphenyl phosphate) is slightly toxic, but is not considered to be a hazardous chemical under the RCRA regulations.

An additional hydraulic system operates the loading platforms in the truck dock area. This system appears to contain about 100 gallons of oil (Photo 16).

Painted Surfaces - In the 5 1/2 years since closure of the facility, painted surfaces inside the main foundry, and in the core building have significantly deteriorated (Photos 17 and 18). Any re-use of the facility will probably involve scraping or sand blasting of painted surfaces. Dust from these operations could contain significant quantities of lead (Pb) and other metallic pigments.

According to the map published with the ordinance, the GHR site does not presently fall within the areas limited by this new ordinance. (Figure 4).

Regulatory Agency Site Lists - Neither this property, nor any immediate neighbors appear on the U.S. EPA superfund site list, or on the Ohio EPA Corrective Action site list.

### CONCLUSIONS AND RECOMMENDATIONS

Cupolas/Baghouse Closure Plan - Amcast/GHR should continue to work with Ohio EPA to develop an acceptable hazardous waste closure plan.

Transformers and Capacitors - U.S. EPA regulations state that transformers containing PCB oils in concentrations of 50-500 ppm are considered to be "PCB contaminated electrical equipment." Plant records indicated that 11 transformers are within these limits.

A strict interpretation of the regulations would consider these units be to out of service. As such,, appropriate storage and disposal regulations would apply (40CFR761.65). These regulations require disposal within one year from the date of shutdown.

Disposal could be accomplished by having a qualified service company draw and replace all fluid that had concentrations of PCB's above 50 ppm. It could also be accomplished by removing the units from the site to an authorized PCB disposal facility. We recommend that one of these options be exercised immediately. Any spilled material should be cleaned up in accordance with 40 CFR 761.125.

The capacitors located in the vaults, and at other locations are also subject to regulation. In the event of disposal or demolition these capacitors must be disposed of by incineration, unless manufacturer's data or testing show PCB concentration below 50 ppm. Any replacement or removal of capacitors from GHR should be in accordance with appropriate regulations.

Underground Storage Tanks - Both federal and state regulations pertaining to underground storage tanks are becoming increasing stringent. In October, U.S. EPA will promulgate a new set of regulations requiring existing petroleum tanks within the next 10 years to:

1. Incorporate a corrosion protection system
2. Incorporate a leak detection system
3. Have a spill prevention plan.
4. Provide insurance or financial guarantees of \$1 million dollars against leakage and clean-up

ATTACHMENT E

# AMCAST

INDUSTRIAL CORPORATION

CORPORATE CENTER

December 16, 1991

Mr. Thomas Buchan  
Environmental Specialist  
Ohio Environmental Protection Agency  
PCB Compliance Division  
1800 Watermark Drive  
P.O. Box 1049  
Columbus, OH 43224-1049

RECEIVED  
91 DEC 19 P3:30

Re: GHR Division  
400 Detrick Street  
Dayton, Ohio

Dear Mr. Buchan:

Enclosed is a copy of the PCB transformer inspection report on the subject site. As you can see, there were eighteen transformers. Not all the transformers were PCB or PCB contaminated transformers.

I hope this information clarifies any questions you have about the transformers. If you have any other questions, please submit them in a letter to my attention.

Very truly yours,

  
James S. Hollander  
Director, Corporate Development

# PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 1 of 18

Equipment Location Vault "D" - Melt Dept. ID# D Serial# 11168-64

Type of Equipment 2000 KVA - ITE PCB Concentration \_\_\_\_\_ PPM

Capacity - Gallons 465 PCB ☒

Date Feb-8-1988 Inspection No. \_\_\_\_\_

Inspected By S. Hume

Date Last Inspected 3-12-88 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

## 1. Size of Leaks

- |                                      |   |
|--------------------------------------|---|
| A. <input type="checkbox"/> Small    | - Any PCB on Any Portion of External Surface        |
| B. <input type="checkbox"/> Moderate | - Any Quantity of PCB Running off the Surface       |
| C. <input type="checkbox"/> Rupture  | - Causing Immediate Cessation of Equipment Location |

## 2. Location & Size of Leaks

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## Description of Service Performed

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## Comments

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PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 2 of 18

Equipment Location Vault "E" Finishing Dept. ID# E Serial# YBR-91832

Type of Equipment 2000 KVA-Westinghouse PCB Concentration \_\_\_\_\_ PPM

Capacity - Gallons 421 PCB ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface
- B. ☐ Moderate - Any Quantity of PCB Running off the Surface
- C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Description of Service Performed

Comments

PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 3 of 18

Equipment Location Vault "F1"-Melt Dept. ID# F1 Serial# YBR - 91831

Type of Equipment 2000 KVA-Westinghouse PCB Concentration \_\_\_\_\_ PPM

Capacity - Gallons 421 PCB ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

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Description of Service Performed

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Comments

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PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 4 of 18

Equipment Location Vault "F2"-Melt Dept. ID# F2 Serial# PBV-7402-01

Type of Equipment 2000 KVA-Westinghouse PCB Concentration \_\_\_\_\_ PPI

Capacity - Gallons 289 PCB ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Description of Service Performed

Comments

PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 5 of 18

Equipment Location Vault "A" Found.Comp. Room ID# A Serial# 1420383

Type of Equipment 500 KVA-Line Material PCB Concentration 60 PPM

Capacity - Gallons 181 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Description of Service Performed

Comments

PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 6 of 18

Equipment Location Vault "A"-Found. Comp.RM.ID# A Serial# 1420384

Type of Equipment 500 KVA-Line Material PCB Concentration 11 PPM

Capacity - Gallons 181 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Description Of Service Performed

Comments

PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 7 of 18

Equipment Location Vault "A"-Found. Comp. Rm. ID# A Serial# 4811763

Type of Equipment 500 KVA - GE PCB Concentration 113 PPM

Capacity - Gallons 298 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

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Description of Service Performed

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Comments

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PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 8 of 18

Equipment Location Vault "A"-Found.Comp.Rm. ID# "A" Lighter Serial# 3010760  
Assumed

Type of Equipment 100 KVA- Westinghouse PCB Concentration 50-500 PPM

Capacity - Gallons Not Marked Oil ☒ New Oil 7/82

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Hawick

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface
- B. ☐ Moderate - Any Quantity of PCB Running off the Surface
- C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

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Description of Service Performed

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Comments

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PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 9 of 18

Equipment Location Vault "A"-Found. Comp.RM.ID# "A" Lighter Serial# 303083

Type of Equipment 100 KVA-Westinghouse PCB Concentration Assumed 50-500 PPM

Capacity - Gallons Not Marked Oil ☒ New Oil 7/82

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Hancock

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☒ None ☐ If Yes, Answer the Following:

1. A. ☒ Small - Any PCB on any Portion of External Surface
- B. ☐ Moderate - Any Quantity of PCB Running off the Surface
- C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Secondary bushing magnet

Description of Service Performed

Comments



PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 10 of 18

Equipment Location Vault "B" - Finishing ID# B Serial # 1224326

Type of Equipment 333 KVA-Line Material PCB Concentration 285 PPM

Capacity - Gallons 220 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Hance

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☒ None ☐ If Yes, Answer the Following:

1. A. ☒ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Down below magnet - secondary bushing magnet

Description of Service Performed

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Comments

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 11 of 18

Equipment Location Vault "B" - Finishing ID# B Serial# 3080552

Type of Equipment 500 KVA-Allis Chalmers PCB Concentration 122 PPM

Capacity - Gallons 210 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Haurin

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

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Description of Service Performed

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Comments

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PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 12 of 18  
No Nameplate

Equipment Location Vault "B" - Finishing ID# B Serial # GHR# G2857

Type of Equipment 333 KVA - Line Material PCB Concentration 4.4 PPM

Capacity - Gallons 190 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. H. H. H.

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Description of Service Performed

Comments

PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 13 of 18

Equipment Location Vault "C" - Core Room ID# C Serial # 3771075

Type of Equipment 333 KVA - Westinghouse PCB Concentration 42 PPM

Capacity - Gallons 163 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Hance

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☒ None ☐ If Yes, Answer the Following:

1. A. ☒ Small - Any PCB on any portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Secondary bushing leaking

Description of Service Performed

Comments

PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 14 of 18

Equipment Location Vault "C"-Core Room ID# C Serial# 3771077

Type of Equipment 333 KVA-Westinghouse PCB Concentration 21.3 PPM

Capacity - Gallons 163 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☒ None ☐ If Yes, Answer the Following:

1. A. ☒ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Secondary bushing Leaking  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Description of Service Performed

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Comments

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GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Equipment Location Vault "C" - Core Room ID# C Serial# 3771076  
Type of Equipment 333 KVA - Westinghouse PCB Concentration 35.6 PPM  
Capacity - Gallons 163 Oil ☒  
Date 2-8-88 Inspection No. \_\_\_\_\_  
Inspected By B-Hawes

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface
- B. ☐ Moderate - Any Quantity of PCB Running off the Surface.
- C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

Description of Service Performed

### Comments

PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 16 of 18

Equipment Location Vault "C" Core Room ID# "C" Lighter Serial# 3030986

Type of Equipment 75 KVA - Westinghouse PCB Concentration 7.3 PPM

Capacity - Gallons Not Marked Oil ☒

Date 2-5-88 Inspection No. \_\_\_\_\_

Inspected By S. J. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☒ None ☐ If Yes, Answer the Following:

1. A. ☒ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Left secondary bushing leaking

Description of Service Performed

Comments

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Equipment Location Vault "C" Core Room ID# "C" Lighter Serial# 301071

Type of Equipment	75 KVA - Westinghouse	PCB Concentration	3.9	PI
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Capacity - Gallons Not Marked Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. J. Hume

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface  
B. ☐ Moderate - Any Quantity of PCB Running off the Surface  
C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

## 2. Location & Size of Leaks

Description of Service Performed

### Comments



PCB TRANSFORMER INSPECTION PROGRAM

GHR Division, DMI  
400 Detrick Street  
Dayton, Ohio 45404

Sheet No. 18 of 18

Equipment Location Vault "F" Found. Comp. Room ID# F Serial# YBR-918

Type of Equipment 2000 KVA-Westinghouse PCB Concentration 229 P

Capacity - Gallons 390 Oil ☒

Date 2-8-88 Inspection No. \_\_\_\_\_

Inspected By S. Howell

Date Last Inspected 9-18-87 Next Inspection Due 4-22-88

Leaks Observed Yes ☐ None ☒ If Yes, Answer the Following:

1. A. ☐ Small - Any PCB on any Portion of External Surface
- B. ☐ Moderate - Any Quantity of PCB Running off the Surface
- C. ☐ Rupture - Causing Immediate Cessation of Equipment Location

2. Location & Size of Leaks

Description of Service Performed

Comments

ATTACHMENT F



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

July 8, 1991

Mr. John Peloquin  
President  
John Paul Enterprises  
400 Detrick Street  
Dayton, Ohio 45404

Mr. Peloquin:

Per your request, enclosed are copies of the federal TSCA PCB Regulations, Notification and Manifesting for PCB Waste Activities and lists of PCB disposal and cleanup contractors.

If you have any questions, you may contact me at 614/644-3063.

Regards,

A handwritten signature in cursive script that reads "Tom Buchan".

Tom Buchan  
Environmental Specialist II  
Division of Emergency and  
Remedial Response

TB/cs



Printed on recycled paper



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

June 21, 1991

Mr. Ray Carcione, President  
Ohio Industrial Trading Company  
1203 West 65th Street  
Cleveland, Ohio 44102

Mr. Carcione:

Per your request, enclosed are copies of the federal TSCA PCB Regulations, Notification and Manifesting for PCB Waste Activities and lists of PCB disposal and cleanup contractors.

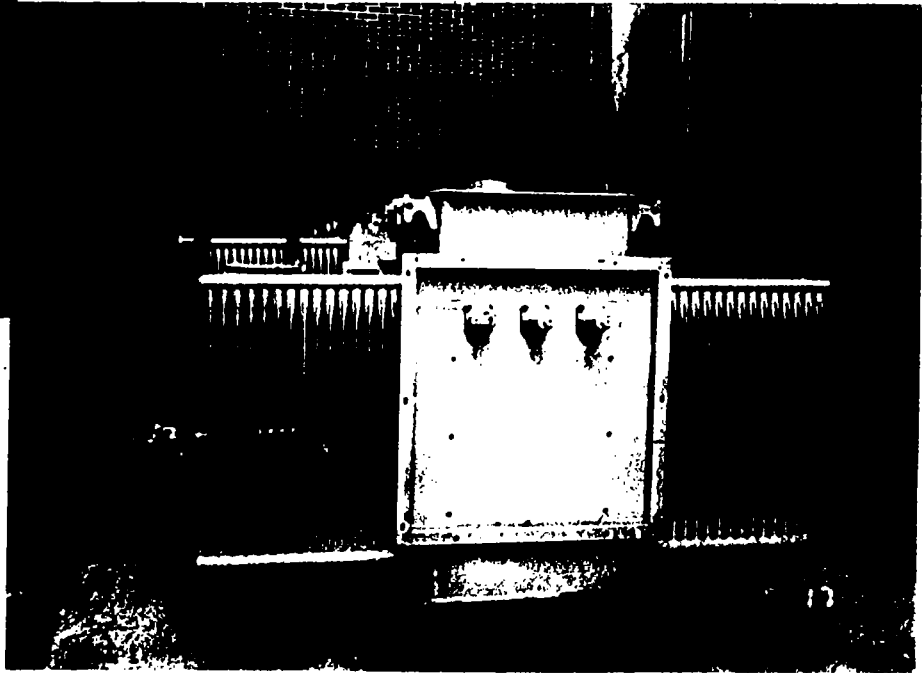
If you have any questions, you may contact me at 614/644-3063.

Regards,

Tom Buchan  
Environmental Specialist II  
Division of Emergency and  
Remedial Response

TB/cs

ATTACHMENT G



Southwest District Office

40 South Main Street  
Dayton, Ohio 45402-2086  
(513) 285-6357  
FAX (513) 285-6249

George V. Voinovich  
Governor

July 9, 1991

RE: JOHN PAUL ENTERPRISES  
MONTGOMERY COUNTY  
OHD 099020133  
GENERATOR

Mr. Raymond Carcione  
1203 W. 65th Street  
Cleveland, Ohio 44102

RECEIVED

'91 JUL 11 AIO:11

Dear Mr. Carcione:

EMERGENCY  
RESPONSE

On July 1, 1991, I conducted an inspection at John Paul Enterprises to determine this facility's status and compliance with applicable state and federal hazardous waste regulations. Mr. Delmar Sybert represented John Paul Enterprises during the inspection.

During this site investigation, all facility operations were down for the undetermined amount of time. The site appeared to be closed. Review of operational records cannot be conducted at this time; findings of site investigations are as follows:

1. Ten 55-gallon drums of PCBs were found in Building G, the truck shop. All PCB waste generation is handled by Mr. Tom Buchan, Central Office, Ohio EPA--phone number: (614) 644-3068. You must contact Mr. Buchan within five days of receipt of this letter.
2. No violations of the Ohio Administrative Code were documented.

Failure to cite specific violations in this correspondence does not relieve John Paul Enterprises from complying with all applicable regulations, nor does it preclude this Agency from citing these violations in the future.

If you have any questions regarding this inspection, please call me at (513) 285-6357.

Sincerely,



George Nemore, Jr., R.S.  
Division of Solid and  
Hazardous Waste Management

klj

cc: Laurie Stevenson, Ohio EPA, Central Office, DSHWM  
~~Tom Buchan, Ohio EPA, Central Office, PCB Unit~~



# CITY OF DAYTON, OHIO

## DEPARTMENT OF FIRE

300 NORTH MAIN STREET DAYTON, OHIO 45402 513/443-4500 FAX 443-4561

RAYMOND J. HUGHES

Director & Chief

May 30, 1991

Mr. Tom Buchan  
Ohio EPA/DERR  
P.O. Box 1049  
Columbus, OH 43266-0149

RE: GHR FOUNDRY, 400 DETRICK - PCB STORAGE

Dear Mr. Buchan,

In regards to our conversation of May 21, 1991, the Dayton Fire Department performed an inspection of the old GHR Foundry complex on April 30, 1991.

During the course of the inspection, we noticed three (3) transformer cases stored inside an old foundry building. We were told that the transformer oil had been tested and removed from the transformers. We were shown a PCB labeled and secured storage room. Approximately twelve (12) PCB 55 gallon drums and several rectangular metal containers of undetermined size were inside.

We have the following information about the property:

Montgomery County Property Tax Records

Parcel # R72-053-07-001 effective October 7, 1988

Ohio Industrial Trading Company  
1203 West 65th Street  
Cleveland, OH 44102

Secretary of State, Department of Taxation

John Paul Enterprises, Inc.

Corporation Charter #728696  
Charter Date July 13, 1988  
Agent James Kirkland  
111 W. First Street  
Dayton, OH 45402  
President John Peloquin

RECEIVED

'91 JUN -3 A9:35

EMERGENCY  
RESPONSE



Tom Buchan  
Ohio EPA/DERR  
May 30, 1991  
page 2

Secretary

Wanda Morris

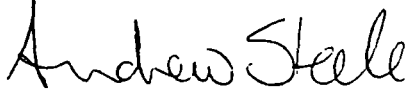
Inspection Contacts

Delman Sybert     Security  
John Peloquin     Partial Owner

If your agency has records, or finds additional environmental or safety concerns relating to the fire service, we would appreciate copies.

If you have any questions, please contact me at (513) 443-4527.

Sincerely,



Andrew M. Steele  
Fire Prevention Specialist I  
Dayton Fire Department

(443 4527)

cc: Harold W. Embry, Supervisor  
Code Enforcement

AMS/mm